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U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

United States District Court
For the District of Minnesota
Civil Complaint No: _____

Adrianne L. Laramore,

Plaintiffs,

22-cv-2370 NEB/ECW

Civil Complaint and Civil Rights
Complaint Under The Fair
Housing Act of
42 U.S.C Section 3601 and
3604 and 42 U.S.C.
Section 1983 for Racial
Discrimination

v.

Quality Residence, LLC. et, al., as a Corporation;
Daniel L. Gelb, in his individual capacity, as a person and official
Capacity, as the Owner of Quality Residence et, al ;and Kelley Martin, in her
individual capacity, as a person and official capacity as Property Manager of
Quality Residence, LLC. et, al.

Defendants,

Now comes, Adrianne L. Laramore, Pro se. Plaintiff pursuant to the

aforementioned United States statutes and states as follows:

- 1) That on the 17th, Day of January 2021 at approximately 2:30 a.m., an unknown vehicle crashes into the residence of 1230 Edgerton Street, Saint Paul, Minnesota 55130, causing damage to the side exterior and the interior of the residence on Edgerton/Hawthorne corner bedroom in which my 12-year-old daughter sleeps in whom is also a TYPE 1 DIABETIC, and not only requires insulin injections physically, yet also suffers anxiety, etc.
- 2) On this particular day aforementioned, had it not been for a six-drawer solid oak dresser and a steel framed queen size bed, Avary Yolanda Renee Coleman would not be alive, based upon the speed of the vehicle and the impact of the automobile into her bedroom.
- 3) Upon the vehicle's intrusion into the residence on this particular day, it was later discovered that the property was not structurally fit for habitation as to the residents located in Unit #1 of this property.
- 4) On the 17th, Day of January 2021 at about 2:30 a.m. Saint Paul Police Patrol in the area responded on this occurrence and found a 2018 Chevrolet Impala Minnesota license plate number DVU 747, with the entire front of this vehicle lodged into the interior of the building and the bedroom of Avary Yolanda Renee Coleman, of which remained immersed for more than 3 hours; requiring Saint Paul Fire Department, Emergency Medical Services, a Towing Service and Professional Building Restoration Team to clear debrees and board up the enormous opening to the side of this property all the while ignoring the 12-year-old Type 1 Diabetic child's health and welfare.
- 5) In addition to the stages of events of which took place on this aforementioned day, certain medical items and equipment needed to support and aid Avary Yolanda Renee Coleman pertaining to her health were destroyed along with the demolishment of her bedroom causing her to panic to her family of five(5) her 19-year-old brother, her 3-year-old brother, her mother, Adrienne and stepfather including and not limited to other relatives.

- 6) Through-out this stage of events all the while Avary Yolanda Renee Coleman's health was deteriorating to the point she required being admitted to the Pediatric Intensive Care Unit of Children's Hospitals of Minnesota Saint Paul where she remained for several days.
- 7) Expounding upon this complaint, the company known as Quality Residence, LLC., has been required by the Housing Inspection Agency of Saint Paul, MN and other Housing agencies to repair the damaged property and specified specific dates and timelines for these acts to be completed, yet no repairs have been completed.
- 8) The residential property of which is the topic of the Civil Complaint and Civil Rights Complaint is under the guise of the Section 8 and the Fair Housing Act and is a federally mandated program as aforementioned above.
- 9) As of the timing of this Civil Complaint, 1230 Edgerton Street Unit #1, Saint Paul, Minnesota is PARTIALLY CONDEMNED according to the City of Saint Paul Department of Safety & Inspections.

Conclusion

[W] herefore, in light of these horrific events, and failure to perform the necessary repairs as required by Housing Inspection Agencies aforementioned, tenant, Adrienne L. Laramore and her family, are demanding that they be compensated for claims of racial discrimination, based on being a Black Woman and mother, in addition to the claims of negligence, emotional distress, pain and suffering, emotional and physical/irreparable harm and FORCED to live in hazardous conditions etc. an amount in excess of Two Million Dollars (\$2,000,000.00).

Respectfully Submitted,

Adrienne L. Laramore, Pro se.

Adrienne L. Laramore Date: 9/27/2022
1230 Edgerton Street Unit #1, Saint Paul MN 55130
Email: peaceispower126@gmail.com
Ph: (763) 639-8798